

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Cr. No. 20-113 (DSD/BRT)

UNITED STATES OF AMERICA,)
)
Plaintiff,) **STATEMENT OF FACTS IN**
) **SUPPORT OF EXCLUSION OF**
v.) **TIME UNDER SPEEDY TRIAL**
)
JOSE A. FELAN, JR.,) **ACT**
)
Defendant.)

Pursuant to 18 U.S.C. § 3161(h)(7)(A), I Jose Felan, Jr., the defendant in this case, agree to the following statement of facts in support of my Motion for an Extension of the Motions Filing Date and Other Dates and to exclude time under the Speedy Trial Act. This case is a complicated case, in which the government has provided my defense counsel over 900 pages of discovery, and numerous video recordings. My defense counsel mailed the discovery on a flash drive to me at the Sherburne County Jail on April 16, 2021, but the jail officials have informed my attorney that the jail did not receive the flash drive. Therefore, my attorney is mailing me another copy of the discovery. My defense counsel and I need more time to review the discovery to determine what motions to file with the Court.

Based on the above facts, I request that the period of time from now until June 1, 2021 be excluded from the time in which I would otherwise have to be brought to trial on my case.

I have discussed this matter with my attorneys. I voluntarily make this request, with full knowledge of my rights under the Speedy Trial Act.

Dated:

4/28/21



Jose A. Felan, Jr.
Defendant

Dated:

4/23/21



Robert D. Sicoli, Attorney for Defendant